

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MICHIGAN  
Southern Division

UNITED STATES OF AMERICA

*ex rel*, Christian Kreipke

Plaintiffs,

Civil Action No.

BRINGING THIS ACTION ON BEHALF OF  
THE UNITED STATES OF AMERICA

v.

Hon. Judge  
Qui Tam Action

WAYNE STATE UNIVERSITY, and  
UNIVERSITY PHYSICIAN GROUP, P.C.,

Defendants.

**FILED UNDER SEAL PURSUANT  
TO 31 U.S.C. § 3730(b)(2)**

**DO NOT PLACE IN PRESS BOX**

**DO NOT ENTER ON PACER**

**AFFIDAVIT OF DR. CHRISTIAN KREIPKE**

STATE OF MICHIGAN )  
 ) ss  
COUNTY OF OAKLAND )

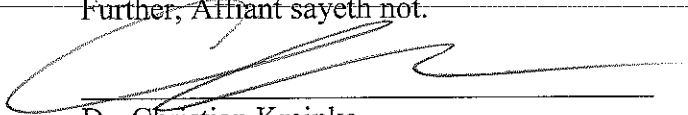
The undersigned, DR. CHRISTIAN KREIPKE, being first duly sworn, deposes and states as follows:

1. I have personal knowledge of the facts asserted herein, and if called to testify, can do so competently;
2. I am the Plaintiff-Relator in this action;
3. I was the principle investigator (PI) or Co-principle investigator (Co-PI) on the following grants 1) Grant Number R01NS069937-01;
4. The supply requests made in the grant proposals were inflated;
5. As an example, on a five year grant like Grant Number R01NS069937-01, we typically only required the following:
  - Antibodies: range \$150-\$1000 per ml (~10,000 over 5 year period)

- Surgical instruments: range \$100-\$300 per instrument (~12,000 over 5 year period)
  - Misc surgical supplies (e.g., gauze, wound clips, etc) (~10,000 over 5 year period)
  - Slides: range \$100-200/ 50 slides (~6,000 over 5 year period)
  - In situ reagents: range \$5,000-\$12,000 per primer (~36,000 over 5 year period)
  - Histological reagents: range \$200-\$2,000 per reagent (~34,000 over 5 year period)
  - Misc lab supplies (e.g., glassware, solvents, culture wells, etc) (~32,000 over 5 year period)
6. Therefore, over a five year grant we required a total amount for supplies of approximately \$140,000;
  7. This is in direct contradiction to the inflated amounts on our grant proposal, which budgeted \$98,000+indirects for the first year and \$98,000+ indirects +3% inflation each subsequent year;
  8. This totaled approximately \$790,848, and was approximately \$650,000 more than we needed;
  9. This is just one example of the over inflation of grant proposals at WSU;
  10. As a result of my first hand knowledge regarding the submission of fraudulently inflated grants I have personal knowledge that the federal government was defrauded as it awarded millions of dollars in grants based on inflated proposals;
  11. I complained to my supervisors, and the administration, about the fraud related to grant proposals;
  12. As a result of my complaints I was targeted by Defendant WSU's administration;
  13. Eventually, I was terminated based on confabulated and concocted statements and data that were untrue and unfounded;
  14. I was summarily terminated without being given due process or following the necessary administrative procedures;
  15. In doing so, Defendant WSU attempted to impugn my reputation and standing in the research community by informing my colleagues that I was guilty of research fraud, when nothing could be further from the truth;

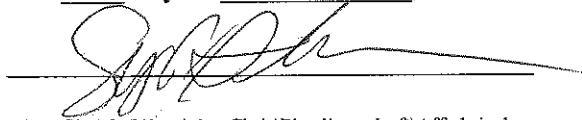
16. When I was terminated, Defendant WSU, in its overzealous attempt to retaliate against me, also terminated my entire staff;
17. Defendant WSU also expelled the staff from their Ph.D track programs, thereby destroying the staff's futures as well;
18. This is despite there being no evidence whatsoever that the staff engaged in any inappropriate activity.

Further, Affiant sayeth not.



Dr. Christian Kreipke

Subscribed and sworn to before me  
this 30<sup>th</sup> day of October, 2012.



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SYED HUSSAIN AKBAR  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF OAKLAND  
MY COMMISSION EXPIRES Jan 21, 2014  
ACTING IN COUNTY OF OAKLAND